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January 29, 2021

**Via ECF**

Hon. Denise L. Cote  
United States District Court for the  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

Re: **In re Perrigo Company plc Securities Litigation, 19-CV-70 (DLC)**

Dear Judge Cote:

We represent Perrigo Company plc in the above-captioned action. We respectfully submit this Letter Motion, in accordance with Section 8(B) of Your Honor's Individual Practices in Civil Cases, for an order sealing portions of Defendants' Memorandum of Law in Opposition to Lead Plaintiffs' Motion for Leave to Amend the Second Amended Complaint (the "Opposition") and the accompanying Declaration of Samuel M. Light (the "Light Declaration"). The documents Perrigo seeks to seal describe sensitive, nonpublic business information concerning legal proceedings outside of the United States (including communications with counsel and other external advisors), determinations made surrounding Perrigo's tax positions, and discussions of Perrigo's internal controls. For the reasons more fully set out in Perrigo's Letter Motion to Seal Portions of Plaintiffs' Motion, ECF 182, Perrigo asks that the Court seal portions of the Opposition and Light Declaration that discuss or reference materials that this Court has already sealed in connection with Lead Plaintiffs' Motion for Leave to Amend the Second Amended Complaint in accordance with *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006). *See* Order, ECF 183.


Defendants have filed the proposed sealed documents contemporaneously with this Letter Motion and they have been electronically related to this Letter Motion.

Respectfully yours,

/s/ Samuel P. Groner  
Samuel P. Groner

cc: All Counsel (via ECF)

Granted. 02.01.21.

  
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DENISE COTE  
United States District Judge